



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

APR 14 2016

Ms. Bridgette L. Rillema, P.E.  
EHS Manager  
Pennsylvania Grain Processing, LLC  
250 Technology Drive  
Clearfield, PA 16830

Dear Ms. Rillema:

The United States Environmental Protection Agency (EPA) hereby requires Pennsylvania Grain Processing, LLC ("PA Grain" or "the Facility") to provide certain information as part of an ongoing EPA investigation to determine the Clean Air Act (CAA or the Act) compliance status of the Manufacturing Facility located at 250 Technology Drive, Clearfield, Pennsylvania 16830.

Pursuant to Section 114(a) of the Act, 42 U.S.C. 7414(a), the Administrator of EPA provides or authorized representative of the Administrator may require, for the purpose of determining whether any person is in violation of, among other things, any implementation plan, standard of performance or emission standard, that any person who owns or operates any emissions source, on a one-time, periodic or continuous basis: establish and maintain records; make reports; install, use and maintain monitoring equipment and use audit procedures or methods; sample emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods and in such manner as the Administrator shall prescribe); keep records on control equipment parameters, production variables or other indirect data; submit compliance certifications; and, provide such other information as may reasonably be required. Authority to require submittal of information pursuant to Section 114 of the Act has been delegated to the Director of the Air Protection Division of EPA Region III.

PA Grain is the owner and operator of emission sources as specified in Section 114(a) of the Act. EPA, Region III, hereby requires PA Grain to submit detailed information in response to the following requests:

1. Conduct emission testing for Volatile Organic Compounds (VOCs) [using published EPA Test Methods or approved alternative] at the stack outlet of the decarbonator tank, which is part of the Biomethanators [Source ID #P211] at the PA Grain facility in Clearfield, PA.
2. The testing of the decarbonator tank should be conducted under two different operating scenarios:
  - a. When the methane generated by the biomethanator system is being diverted to the backup



- flare (C211). As part of this testing scenario, VOC emissions from C211 should simultaneously be measured; and
- b. When the methane generated by the biomethanator system is being sent to the dry distillers grains with solubles (DDGS) Dryers, that are part of the ethanol manufacturing operations [Source ID #P203], and backup flare C211 is not in operation.

A pre-test protocol meeting the requirements listed in the Pennsylvania Department of Environmental Protection's (PADEP) current Source Testing Manual and using appropriate, approved EPA Test Methods shall be submitted for approval by both the PADEP Bureau of Air Quality, Source Testing Section, and U.S. EPA Regional Office in Philadelphia, Pennsylvania at least forty five (45) days prior to the scheduled test date.

3. The pre-test protocol should be submitted to the following PADEP offices as well as EPA Region III:

Muhammad Zaman, Northcentral Region Air Program Manager  
Pa Department of Environmental Protection- Air Quality Program  
208 West Third Street, Suite 101  
Williamsport, Pennsylvania 17701

Rick Szekeres, Environmental Group Manager  
Bureau of Air Quality, Source Testing Section  
400 Market Street, 12<sup>th</sup> Floor  
Harrisburg, Pennsylvania 17105-8468

Please submit your responses to the information request and testing requirement for Region III to:

Ms. Gwendolyn Supplee, Life Scientist  
US EPA-Region III  
Air Protection Division, Mail Code 3AP20  
1650 Arch Street  
Philadelphia, PA 19103

PA Grain must collect parametric data from the exhaust stack during the testing in order to characterize both the biomethanators and the decarbonation tank operating conditions during each testing scenario. The biomethanators and decarbonation tank must be operating at maximum normal operating conditions as specified in the PADEP-issued Plan Approval No. 17-00063C. Testing shall be completed within one hundred-eighty days (180) of your receipt of this letter. The test report shall be submitted to the listed regulatory agencies within sixty (60) days of completion of the testing programs. The submitted test report should meet the requirements listed in the current PADEP Source Testing Manual.

Failure to provide the information required may result in the issuance of an Order requiring compliance with the requirements, or the initiation of a civil action pursuant to Section 113 (b) of the Act, 42 U.S.C. Section 7413(b). In addition, Section 113(c)(2) of the Act provides that "any person who



knowingly makes any false material statement, representation, or certification in, or omits material information from ... any ... document required pursuant to this Act ... shall upon conviction be punished by a fine pursuant to Title 18 of the United States Code, or by imprisonment for not more than two years, or both." The information you provide may be used by EPA in administrative, civil and criminal proceedings.

If you should have any questions regarding this requirement for information and testing, please contact Gwendolyn Supplee of the APD staff, at (215) 814-2763 or [supplee.gwendolyn@epa.gov](mailto:supplee.gwendolyn@epa.gov). The requirement for submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

Sincerely,

A handwritten signature in blue ink, appearing to read "Nikos Singelis", with a long horizontal flourish extending to the right.

Nikos Singelis, Acting Director  
Air Protection Division

